

A.T. Kearney, Inc.
222 South Riverside Plaza
Chicago, Illinois 60606
312 648 0111
Facsimile 312 648 1939-2302

Management
Consultants

April 25, 1990

ATKEARNEY

Ms. Rowena Sheffield
Regional Project Officer
U.S. Environmental Protection Agency
Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 33065

Reference: EPA Contract No. 68-W9-0040; Work Assignment No. R04-06-01; Safety-Kleen Corporation, Jackson, Mississippi; RCRA Facility Assessment; EPA I.D. No. MSD000776765; Final Deliverable

Dear Ms. Sheffield:

Enclosed please find the Draft RCRA Facility Assessment (RFA) Report for the above-referenced facility. This report is based on a preliminary review (PR) of the U.S. EPA Region IV and the Mississippi Bureau of Pollution Control (MBPC) files, and a visual site inspection (VSI). The PR was conducted during November 1989, and the VSI was conducted on March 1, 1990. The Safety-Kleen Corporation facility (Safety-Kleen) is located in Jackson, Mississippi, and occupies approximately one and one-half acres within a general commercial use zone. Safety-Kleen acts as a service, storage and transfer facility. The company which began operating at this site in 1979, leases small-parts washers and solvents to customers, collects spent solvents from customer sites and stores the waste solvents at the Jackson facility in drums and tanks until they are shipped to Safety-Kleen's recycling center in Denton, Texas.

Hazardous waste managed by this facility is classified as D001, D006, D007, D008, F002, F003, F004 and F005. These wastes include: solvents; mineral spirits; dry cleaning wastes which contain perchloroethylene and 1,1,2-trichloro-1,2,2-trifluoroethane; paint wastes which consist of various lacquer thinners, and metals; dumpster and tank bottom sediment; and immersion cleaner which contains chlorinated solvents (methylene chloride and orthodichlorobenzene) and cresylic acid. Approximately 219,000 gallons of hazardous waste is stored and shipped annually from this facility.

The PR and VSI resulted in the identification of seven solid waste management units (SWMUs). Three of these units, the Container Storage Area (SWMU 1), the Paint Waste Shelter (SWMU 4), and the Tanker Truck Load/Unload Area (SWMU 7) were

COR

MSD000776765

Ms. Rowena Sheffield
April 25, 1990
Page Two

suggested for no further action. The other four units, the Waste Solvent Tanks (SWMU 2), the Work Area (SWMU 3), the Facility Stormwater Control (SWMU 5), and the Truck Washing Area (SWMU 6) were suggested for Phase II sampling. The suggested sampling is concentrated at the Stormwater Control because the other two units both release to this unit which in turn discharges to the environment.

Please feel free to call me or Joe Atchue the Kearney Team Work Assignment Manager (who can be reached at 703/548-4700) if you have any questions.

Sincerely,



Ann L. Anderson
Technical Director

Enclosure

cc: N. Bethune, Region IV
A. Glazer
L. Poe
G. Bennis (w/o enc)
J. Atchue
A. Williams (w/o enc)
G. Kline, MRI

COR

MS 000

776765

INTERIM RCRA FACILITY ASSESSMENT REPORT

SAFETY-KLEEN CORPORATION
Jackson, Mississippi

EPA I.D. No. MSD000776765

Prepared for:

Ms. Rowena Sheffield
U.S. Environmental Protection Agency
Region IV
345 Courtland Street, N.E.
Atlanta, GA 30365

Prepared by:

A.T. Kearney, Inc.
222 South Riverside Plaza
Chicago, IL 60606

EPA Contract No. 68-W9-0040
Work Assignment No. R04-06-01

April 1990

MSD000776765

INTERIM RCRA FACILITY ASSESSMENT REPORT

Safety-Kleen Corporation
Jackson, Mississippi
EPA I.D. No. MSD000776765

TABLE OF CONTENTS

I.	EXECUTIVE SUMMARY.....	I-1
II.	INTRODUCTION.....	II-1
	A. File Search and VSI.....	II-1
	B. Facility Description.....	II-2
	C. Regulatory History.....	II-6
	D. Environmental Setting.....	II-8
III.	SWMU AND AOC DESCRIPTIONS.....	III-1
VI.	SUMMARY.....	IV-1
V.	SUGGESTED SAMPLING STRATEGY.....	V-1
VI.	REFERENCES.....	VI-1
APPENDIX A	SWMU LOCATION MAP.....	A-1
APPENDIX B	LOG BOOK.....	B-1
APPENDIX C	PHOTOGRAPH LOG.....	C-1

LIST OF TABLES

<u>TABLE NO.</u>		<u>PAGE</u>
I-1	Summary of Suggested Further Actions.....	I-3
IV-1	List of SWMUs Identified During RFA.....	IV-1
IV-2	SWMUs Requiring No Further Action.....	IV-2
IV-3	SWMUs Requiring Phase II Sampling.....	IV-3

LIST OF FIGURES

<u>FIGURE NO.</u>		<u>PAGE</u>
II-1	Spent Mineral Spirits Flow Diagram.....	II-3
II-2	Site Location Map.....	II-9
II-3	Site Layout Map.....	II-10
III-1	Waste Flow at SWMUs 2 and 3.....	III-5
A-1	SWMU Location Map.....	A-1

I. EXECUTIVE SUMMARY

The 1984 Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA) authorized the Environmental Protection Agency (EPA) to require corrective action for releases of hazardous wastes and/or hazardous constituents from solid waste management units (SWMUs) and other areas of concern (AOCs) at all operating, closed or closing RCRA facilities. The intention of this authority is to address previously-unregulated releases to air, surface water, soil and groundwater, and the generation of subsurface gas. The first phase of the corrective action program, as established by the EPA, is the development of a RCRA Facility Assessment (RFA). The RFA includes a Preliminary Review (PR) of available relevant documents, a Visual Site Inspection (VSI) and, if appropriate, a Sampling Visit (SV).

This RCRA Facility Assessment (RFA) is based on a preliminary review (PR) of the U.S. EPA Region IV and the Mississippi Bureau of Pollution Control (MBPC) files, and a visual site inspection (VSI). The PR was conducted during November 1989, and the VSI was conducted on March 1, 1990. The purpose of the RFA is to identify solid waste management units (SWMUs) located at the facility, and to evaluate their potential for release of hazardous constituents to the environmental media. The environmental media are air, surface water, soil, and groundwater, and the potential for subsurface gas generation. In addition to SWMUs, Areas of Concern (AOCs) are also identified. AOCs may be potential sources of release of hazardous constituents to the environment which do not necessarily involve wastes.

The Safety-Kleen Corporation facility (Safety-Kleen) is located in Jackson, Mississippi, and occupies approximately one and one-half acres within a general commercial use zone. Safety-Kleen acts as a service, storage and transfer facility. The company which began operating at this site in 1979, leases small-parts washers and solvents to customers, collects spent solvents from

customer sites and stores the waste solvents at the Jackson facility in drums and tanks until they are shipped to Safety-Kleen's recycling center in Denton, Texas (Reference 23).

Hazardous waste managed by this facility is classified as D001, D006, D007, D008, F002, F003, F004 and F005. These wastes include: solvents; mineral spirits; dry cleaning wastes which contain perchloroethylene and 1,1,2-trichloro-1,2,2-trifluoroethane; paint wastes which consist of various lacquer thinners, and metals; dumpster and tank bottom sediment; and immersion cleaner which contains chlorinated solvents (methylene chloride and orthodichlorobenzene) and cresylic acid. Approximately 219,000 gallons of hazardous waste is stored and shipped annually from this facility (References 14 and 23).

The PR and VSI resulted in the identification of seven SWMUs. A SWMU location map is located in Appendix A. Three of these units, the Container Storage Area (SWMU 1), the Paint Waste Shelter (SWMU 4), and the Tanker Truck Load/Unload Area (SWMU 7) were suggested for no further action. The other four units, the Waste Solvent Tanks (SWMU 2), the Work Area (SWMU 3), the Facility Stormwater Control (SWMU 5), and the Truck Washing Area (SWMU 6) were suggested for Phase II sampling. The suggested further actions are outlined in Table I-1.

TABLE I-1

SMMU/AOC	Type of Units	Years in Operation	Waste Managed	Pollutant Migration Pathways (GW, SW, S, A, SS)	Evidence of Release	Exposure Potential ¹	Need for Interim Measures	Recommendation	
								RFI	No Further Action
1.	RCRA Regulated Storage	1979 to present	Immersion Cleaning and Dry Cleaning Waste	--	No	L	--		X
2.	RCRA Regulated Tanks	1979 to present	Dirty Mineral Spirits	S, GW	No	L	--		X 2
3.	Solvent Return/Fill	1979 to present	Clean and Dirty Mineral Spirits	S, SW, GW	Yes	L	--		X 2
4.	Paint Waste Shelter	1988 to present	Clean Waste Paint	--	No	L	--	X	
5.	Stormwater Management	1988 to present	Stormwater	S, SW, GW	Yes	L	--		X 2
6.	Truck Washing	1979 to present	Wastewater from truck washing	S, SW, GW	No	L	--		X 2
7.	Solvent Management	1979 to present	Clean and Dirty Mineral Spirits	--	No	L	--	X	

¹ L designates low, M designates a moderate, and H designates a high exposure potential; see SMMU description for substantiation
² RFA Phase II sampling suggested

References for each unit are provided in the associated SMMU/AOC Description

II. INTRODUCTION

The 1984 Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA) provide new authority to the Environmental Protection Agency (EPA) to require comprehensive corrective actions for releases of hazardous waste and hazardous constituents from solid waste management units (SWMUs) and areas of concern (AOCs) at all operating, closed or closing RCRA-regulated facilities. The intent of this authority is to address previously unregulated releases to air, surface water, soil and groundwater, and the generation of subsurface gas. In order to accomplish this objective, a RCRA Facility Assessment (RFA) is undertaken, consisting of a Preliminary Review (PR), of available and relevant documents, a Visual Site Inspection (VSI) and, if warranted, a Sampling Visit (SV). This report summarizes the results of PR and VSI of the Safety-Kleen Jackson, Mississippi facility (EPA ID No. MSD000776765).

A. FILE SEARCH AND VSI

The report is based on a review of the file materials maintained at EPA Region IV and the Mississippi Bureau of Pollution Control (MBPC) including RCRA, CERCLA, Air, Water and Groundwater files. The regional file search was conducted by Patricia Martz of A.T. Kearney, Inc., and Paula Goggin of Kearney/Centaur. The file search at the state office was conducted by Dierdre McNulty of A.T. Kearney, Inc. In addition, this report is based on the information gathered during the VSI.

The VSI was conducted by Paula Goggin, and J.A. Atchue III, of Kearney/Centaur on March 1, 1990. Other participants were Nancy Bethune of EPA Region IV, Steve Spengler of the Mississippi Department of Natural Resources (MDNR), Jay Lanahan of Safety-Kleen, and Ed Lucky of Safety-Kleen.

Section II consists of this introduction, the facility's description, regulatory history and environmental setting. A description of the SWMUs is presented in Section III. Section IV

contains tables which summarize the findings from the PR and VSI. Suggested sampling strategies are located in Section V. References used to prepare this report are listed in Section VI.

B. FACILITY DESCRIPTION

Ownership

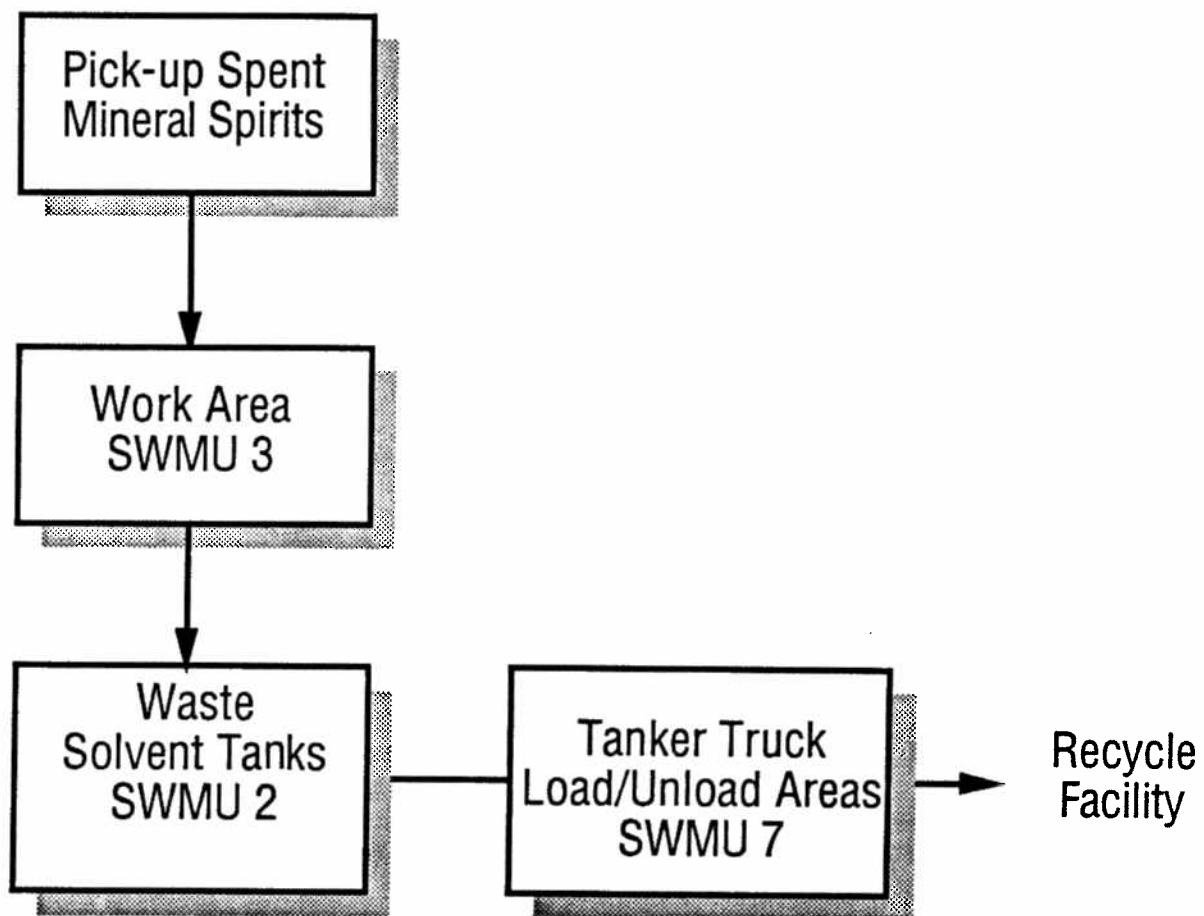
The Safety-Kleen facility in Jackson, Mississippi, began operation in 1979. The facility representatives could not report what the use of the land was before Safety-Kleen leased it. The landowner was Jonnie Richardson of Clinton, Mississippi, while the facility operator was Safety-Kleen Corporation (Reference 8). In 1989, Safety-Kleen purchased the Jackson, Mississippi facility and became both owner and operator (References 41, 56).

Process Description, Waste Generation and Waste Management

The Jackson Safety-Kleen facility is a service-oriented operation that leases small parts washing equipment, which contains hydrocarbon solvents and chlorinated solvents, to automotive repair and industrial maintenance shops. The parts washers are leased to customers under a contractual agreement that provides regularly scheduled solvent changes and machine maintenance. Under the agreements between Safety-Kleen and its customers, the ownership of the solvents remains with Safety-Kleen and the customers lease the solvents. The used solvents are recycled at the Safety-Kleen Corporation Denton, Texas recycle facility (Reference 3). Figure II-1 is a waste flow diagram for the facility (Reference 23).

Safety-Kleen handles a variety of wastes. There are four basic processes at the Jackson facility to manage them. No treatment of wastes occurs here. On a regularly scheduled basis, a Safety-Kleen sales representative collects the waste at a customer's place of business. The representative retrieves drums of waste mineral spirits and replaces them with drums of clean mineral spirits; 16-gallon drums of spent immersion cleaner and replaces them with drums of fresh immersion cleaner; drummed or boxed dry

Figure II-1
Spent Mineral Spirits Flow Diagram
At the Jackson Facility



cleaning solvent waste; and 5-gallon pails or 16-gallon drums of paint waste. Upon arrival at the Jackson facility, the drummed waste mineral spirits are loaded into the Work Area (SWMU 3) and emptied into one of two dumpsters located there; the spent immersion cleaner, and dry cleaning waste is placed in the Container Storage Area (SWMU 1) located in the facility warehouse; and the paint waste is placed in the Paint Waste Shelter (SWMU 4). These processes are discussed in greater detail below.

As stated above waste mineral spirits collected from various customers is brought into the Work Area (SWMU 3). The drums containing the solvents are off-loaded from the trucks and immediately emptied into the dumpsters. The dirty solvent is discharged from the two dumpsters on a batch basis by a pump. The solvent will flow to one of the two Waste Solvent Tanks (SWMU 2) (one 8,000 gallon and one 4,000 gallon tank). The tank that will be utilized depends on how full the tanks are. The liners from the dirty solvent drums are placed in a 30 gallon drum, which is stored in the Waste Paint Shelter (SWMU 4). The drums which contained the waste mineral spirits are then prepared for reuse, by inserting a new liner, and filling the drums with clean solvent at the Work Area (SWMU 3). Approximately weekly, a tanker truck is dispatched from the recycle center in Denton, Texas, to deliver a load of clean mineral spirits and to collect the waste mineral spirits at the Jackson facility. This process takes place at the Tanker Truck Load/Unload Area (SWMU 7) (References 23, 56).

All other wastes picked up by customer representatives have a hazardous waste label placed on the drum. These wastes are either delivered directly to the Waste Paint Shelter (SWMU 4), or the Container Storage Area (SWMU 1). The former unit manages all ignitable wastes, while the latter manages all other nonflammable containerized waste. Both units were also observed during the VSI to be used for the storage of some product. According to facility representatives, a truck from the New Castle, Kentucky recycle center delivers drums of fresh immersion solvent, and

collects the immersion cleaner, the drums and boxes of dry cleaning waste, and the pails and drums of paint waste on an approximately quarterly schedule (References 23, 56).

The Jackson service center was designed to facilitate the handling and storage of wastes resulting from the services offered by Safety-Kleen (Reference 23). Six types of waste result from the servicing of customers and the maintenance of the service center. These six wastes are spent mineral spirits, dumpster sediment, bottom sediment from the tanks, spent immersion cleaner, dry cleaning waste and paint waste.

Between 120,000 and 185,000 gallons of dirty mineral solvents are reportedly removed annually and shipped to the Safety-Kleen recycle center in Denton, Texas. This waste is classified as ignitable (D001) and EP Toxic (D006 and D008) because the solvent may contain lead and/or cadmium (References 23, 56).

Approximately every two years, the bottom sediment in the two dirty solvent tanks is removed. A Safety-Kleen vacuum truck is used for this purpose and can collect up to 4,000 gallons of this waste. Sediment also accumulates in the bottom of the dumpsters located in the Work Area (SWMU 3). Approximately, 2,000-gallons of sediment are removed annually, by bucket and shovel, drummed and stored in the Container Storage Area (SWMU 1), until it can be shipped for reclamation at the Denton facility. The sediment is ignitable (D001) and EP Toxic (D006 and D008) (References 23, 56).

Immersion cleaner remains in the drum in which it was originally used until it is received at the recycle center. Approximately, 3,700-gallons of immersion cleaner are stored annually in the Container Storage Area (SWMU 1). The immersion cleaner contains chlorinated solvents (F002) and cresylic acid (F004). These drums are shipped to Safety-Kleen's Denton, Texas recycle center (Reference 23).

Dry cleaning wastes consist of spent filter cartridges, powder residue from diatomaceous or other powder filter systems, and still bottoms. Approximately, 12,000-gallons of dry cleaning wastes are stored annually in the Container Storage Area (SWMU 1). About 80% of the dry cleaning solvent used is perchloroethylene (F002), approximately 17% is mineral spirits (D001), and the remaining 3% is trichloro-trifluoroethane (F002). The drums and boxes of dry cleaning wastes are shipped to Safety-Kleen's recycle center in Denton, Texas (References 23, 56).

Paint wastes consist of various lacquer thinners, containing non-halogenated solvents, (D001, F003 and F005) and metals (D006, D007 and D008). Approximately, 14,300-gallons of paint wastes are stored annually in the Paint Waste Shelter (SWMU 4). These drums and pails of paint wastes are shipped to the New Castle, Kentucky reclamation facility (References 23, 56).

The facility also washes its trucks on site on an as needed basis. This occurs at the Truck Wash Area (SWMU 6), with the wastewater from this process being discharged via the Facility Stormwater Control (SWMU 5).

C. REGULATORY HISTORY

Prior to 1985, the Jackson facility was not a RCRA regulated facility. With the revised solid waste definition of January 1985, the Jackson facility qualified for interim status for those wastes which were being recycled and were newly regulated (References 7, 9, 10). In July 1985, Jonnie Richardson and Safety-Kleen submitted a RCRA Part A permit application for container and tank storage (Reference 8). In October 1987, Safety-Kleen submitted its RCRA Part B permit application for the storage of waste mineral spirits (D001, D006 and D008) in two above-ground tanks with a total capacity of 12,000 gallons, and two container storage areas for hazardous waste (D001, D006, D008, F002, F003, F004, and F005) (Reference 23). The total capacity of the two container storage areas was approximately 6,500 gallons.

In October 1988, a revised Part B permit application (Reference 35) was submitted in response to some deficiencies in the initial permit application. In November of 1988, Safety-Kleen responded to the September 1988 Notice of Deficiency for the Part B Permit Application (Reference 36). Within two months, eleven responses were made by Safety-Kleen. Two deficiencies were with regard to waste management practices, four were with respect to revisions to the plan, two were necessary paper work submittals, and three were requested tests that were to be forwarded at a later date. The responses made by Safety-Kleen were apparently satisfactory.

In July 1989, a revised Part A permit application was submitted after Safety-Kleen purchased the facility and updated the owner information (Reference 41). In July 1989, the State of Mississippi Department of Natural Resources (MDNR) issued a State of Mississippi Hazardous Waste Management Permit (HW-89-756-01) to operate the facility (Reference 43).

In August 1989, Safety-Kleen submitted an Application for Permit to Construct and/or Operate Air Emissions Equipment for the State of Mississippi Department of Natural Resources Bureau of Pollution Control. This application was in regard to air emissions equipment for the mineral spirits storage tanks (Reference 45). In September 1989, a State of Mississippi Air Pollution Control Permit (1080-00026) was issued (Reference 48).

Several facility inspections were performed by state and EPA personnel between 1986 and 1988. A number of minor deficiencies were noted and subsequently corrected by the facility with no administrative actions on record (References 15, 16, 29, 32). One deficiency that was noted several times was the storage of ignitable waste within 50 feet of the property boundary. Safety-Kleen was reportedly attempting to obtain a variance for the 50 foot rule, and to purchase the adjacent property (References 14, 15, 16, 19, 20, 21).

D. ENVIRONMENTAL SETTING

Location/Description

The Jackson facility is located in Hinds County, approximately 3,800 feet west of I-220 on Richardson Drive. The facility's latitude and longitude are 32° 21' 15" N and 90° 15' 23" W. This area is zoned for general commercial use (Reference 23). See Figure II-2 (Reference 23). The facility is approximately 1.5 acres in area with approximately one half of the area currently used for operations. The entire improved portion of the facility consists of either buildings or concrete. Figure II-3 is a site layout of the facility.

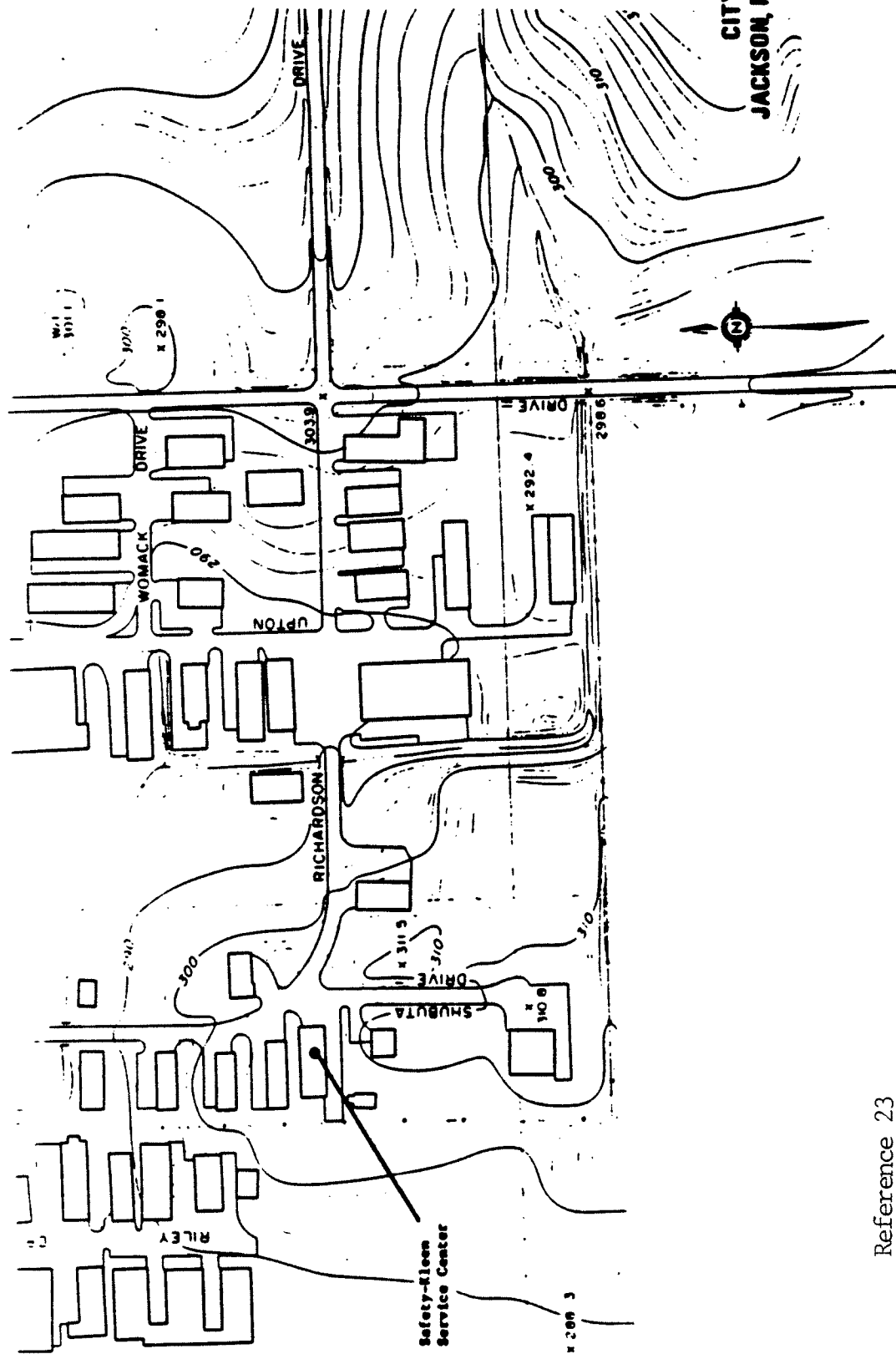
Climate and Meteorology

The climate is characterized by long, hot summers due to moist tropical air from the Gulf of Mexico. The average temperature in summer is 80°F. In contrast, winters are cool and short. The average temperature in winter is 48°F. During the winter months, snowfall is rare. Total annual precipitation is about 55 inches with a peak in the winter. Average windspeed is highest in March measuring 10 miles per hour. The wind generally blows from a southerly direction (Reference 55).

Topography, Surface Drainage and Flood Plain

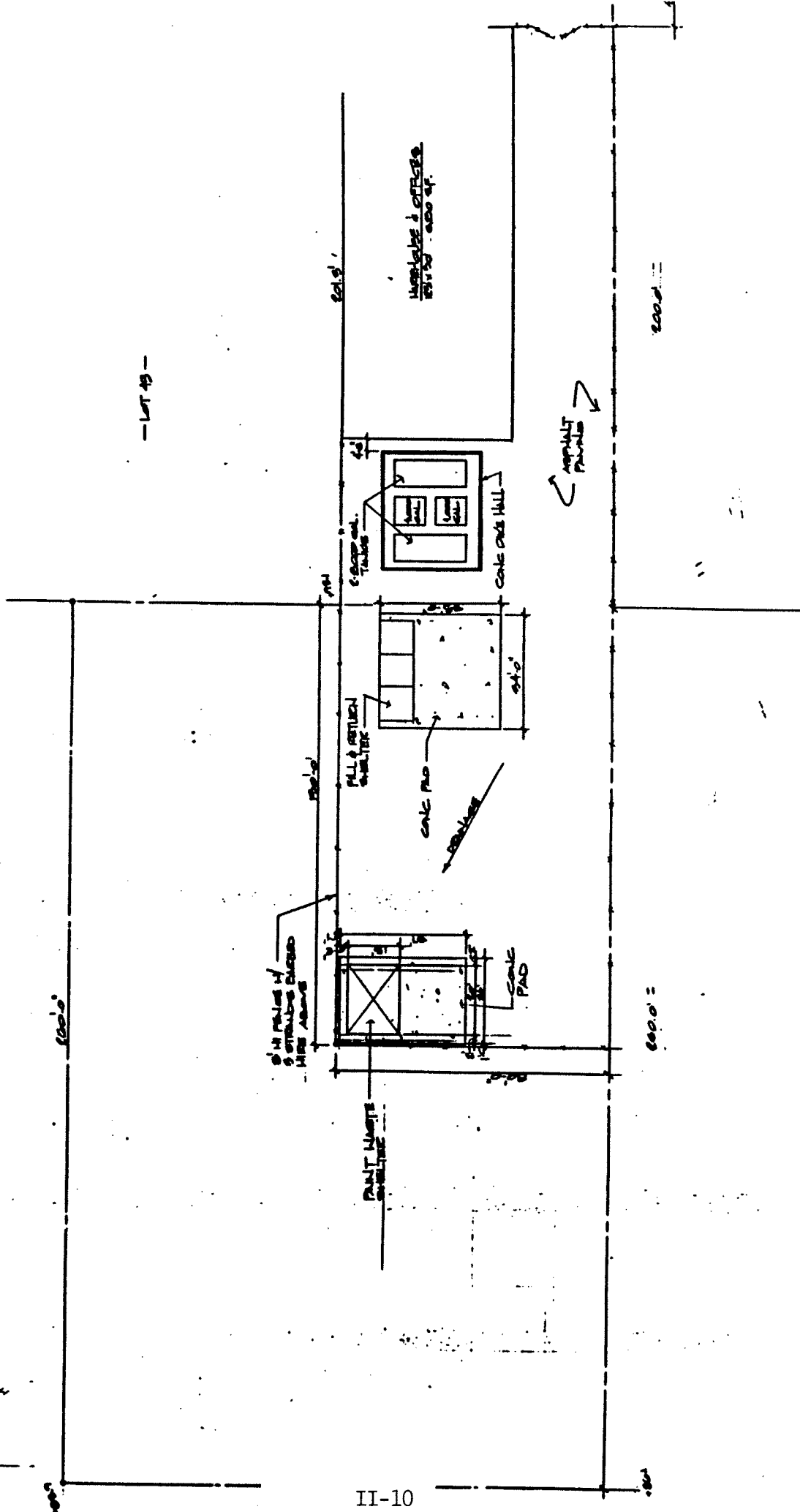
The topography of Hinds County is characterized by high, rugged hills with steep side slopes and narrow valleys. Also, there are lower more rolling hills, wider valleys, and gentler slopes. Hinds County is bisected by a north to south running ridge which separates the drainage basins of the Pearl River in the East and the Big Black River in the West (Reference 55). This facility which is approximately 300 feet above sea level is not located on the 100-year flood plain. The Jackson facility has a Facility Stormwater Control (SWMU 5) which collects most run-on and channels it to a low area to the facility's northeast.

FIGURE II-2
SITE LOCATION MAP



Reference 23

SITE LAYOUT MAP



Geology and Soils

Although no soil borings have been performed at the facility, the soil in its vicinity is reportedly a Loring silt loam which is moderately well-drained, located within a mapping unit identified as LuC, Loring-Urban (Reference 23). This complex (as all Loring association complexes) is found on moderately well drained upland areas (Reference 55).

The LuC complex is described as being strongly to slightly acid. The top five inches is described as being a brown silt loam, which is reportedly underlain by a 22 inch thick strong brown silt loam. Below this unit for approximately another 34 inches is a compact brittle silt loam fragipan. The next unit under the fragipan layer is a brown and gray mottled brown silt loam which terminates at a depth of approximately 80 inches below surface (Reference 55).

Groundwater

No facility specific groundwater information was available. Conversations with personnel at the MDNR suggested that the water table in the area ranged from 30 feet to 150 feet in depth, and that groundwater flow would be generally to the southwest. It should be noted however that the soil classification unit which the facility is located in is reportedly liable to local perched water table (Reference 55).

Sixteen artesian wells in Hinds County monitored groundwater levels which were reported to range from zero to 304 feet. These wells were drilled for various purposes such as public supply and domestic use (Reference 57).

Water Supply

The facility is supplied water by the City of Jackson and sanitary wastes are discharged off-site to a Publicly Owned Treatment Works (References 23, 56).

Receptor Information

The Safety-Kleen facility is located on general commercial use land. The surrounding property is zoned for commercial and industrial use. Therefore, there are several other businesses located within 100 yards of the facility. During facility operations, there is a potential for release to the air, soil, surface water, and groundwater from several units (References 21, 57).

III. SWMU AND AOC DESCRIPTIONS

A total of seven SWMUs were identified as a result of the RFA performed at this facility. It was suggested that three of these units have a Phase II sampling visit performed, while no further action was suggested for the remaining units.

SWMU DATA SHEET

SWMU NUMBER: 1

PHOTO NUMBERS: 1, 2

NAME: Container Storage Area

TYPE OF UNIT: Drum Storage Area

PERIOD OF OPERATION: 1979 to present

PHYSICAL DESCRIPTION AND CONDITION:

This is a RCRA permitted unit which stores 16 and 30 gallon drums of dirty immersion cleaner, and dry cleaning waste, and has a reported capacity of 4,464 gallons. The overall dimensions of the unit are approximately 30 feet by 50 feet. It is located inside the facility warehouse area (which is a sheet metal building with a sealed concrete floor) and has a secondary containment system with a capacity of 448.8 gallons. This secondary containment system consists of a 6 inch wide by 4 inch high steel reinforced concrete curb encircling the majority of the unit with a 12 foot by 2 foot by 5 foot deep collection trench at the entrance way. Steel grates cover the trench to facilitate the movement of drums across them. The trench was observed to be uncracked and dry at the time of the VSI. Facility representatives reported that loads of dirty immersion cleaner and dry cleaning waste were loaded into this unit on a daily basis. Typically the representatives drive the trucks directly to the unit and immediately off-load any drums which need to be stored there. The facility representatives reported that approximately 1440 gallons of waste immersion cleaner and 800 gallons of dry cleaning waste are stored here per month. The wastes are reportedly picked up on an approximately quarterly basis, depending on the amount of waste present. During the VSI the unit was observed to manage both waste and product. The facility representatives acknowledged that as a common practice. Although several cracks were observed in the floor at the time of the VSI, they appeared to be shallow, and the floor's polyurethane seal appeared intact. No evidence of spills inside the unit was noted at the time of the VSI.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

Immersion cleaning wastes (F002, F004); and dry cleaning wastes (D001, F002).

RELEASE PATHWAYS:

Air (L)	Surface Water (L)	Soil (L)
Groundwater (L)	Subsurface Gas (L)	

Project Name: Safety-Kleen
Jackson Facility

Date: April 1990

SWMU DATA SHEET

HISTORY AND/OR EVIDENCE OF RELEASE(S):

There is no history of release in the file material, and no releases were observed at the time of the VSI.

RECOMMENDATIONS: No Further Action (X)
RFA Phase II Sampling ()
RFI Necessary ()

REFERENCE(S): 23, 56

COMMENTS:

No further action other than continued compliance with RCRA requirements.

Project Name: Safety-Kleen
Jackson Facility

Date: April 1990

SWMU DATA SHEET

SWMU NUMBER: 2

PHOTO NUMBERS: 10, 11, 12

NAME: Waste Solvent Tanks

TYPE OF UNIT: Tank storage for hazardous waste and product

PERIOD OF OPERATION: 1979 to present

PHYSICAL DESCRIPTION AND CONDITION:

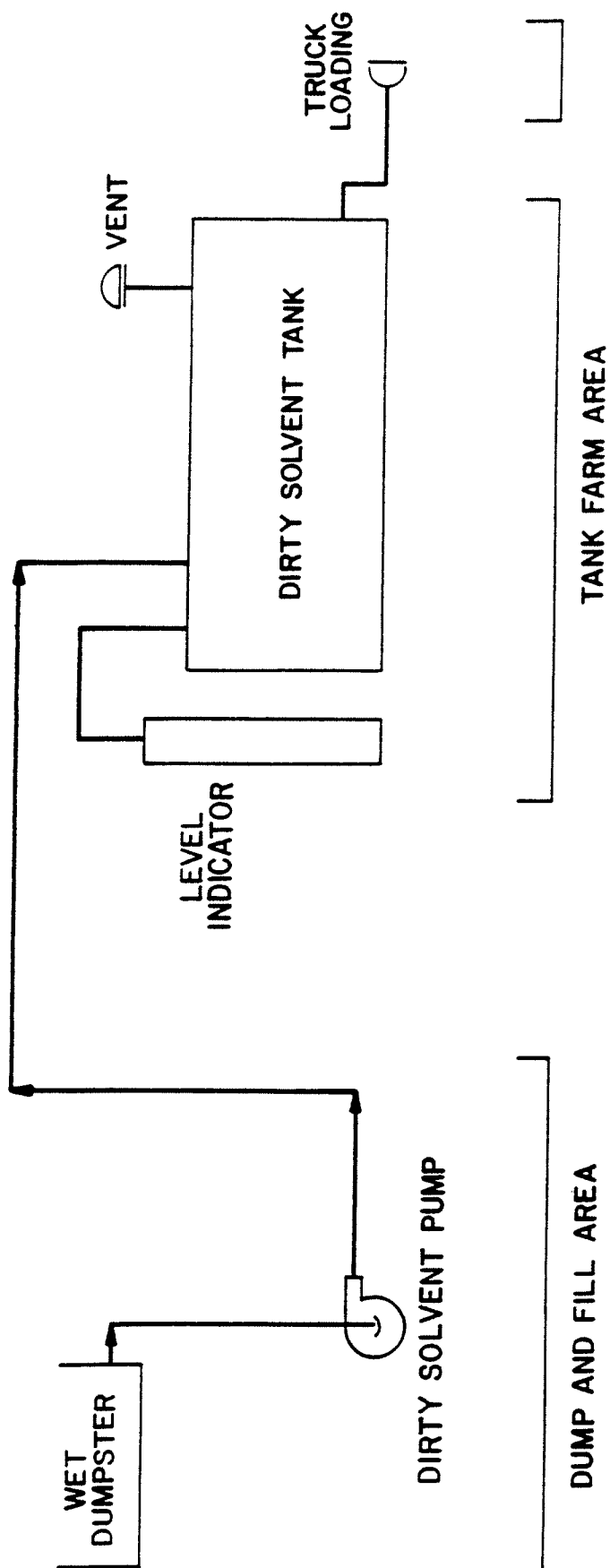
This RCRA-regulated unit consists of one 8,000 gallon tank, and one 4,000 gallon tank used to store waste mineral spirits. The tanks reside within a concrete vault containment system, which is inspected yearly according to the facility representatives. The containment system is of poured, reinforced concrete construction. Its overall dimensions are (approximately) 35 feet by 28 feet by 36 inches in height, yielding a total containment capacity of approximately 22,000 gallons. At the time of the VSI it was observed to be a polyurethane coated concrete pad and wall system (a vault), apparently poured as one unit. There were no drainage points, or major cracks observed during the VSI, and there was approximately one to two inches of standing water in the unit apparently from the recent rains. Facility representatives reported that this water is visually checked for a sheen and if none is noted, then it is pumped out of the unit to the nearby soil. A recent (February) inspection performed by the facility indicated that the containment system was in "good condition". The current containment system only became operational in 1985 when the tanks came back under interim status. No information was available from the facility representatives with regard to a former containment system. Both tanks are of carbon steel construction, and are horizontally mounted on skids. Both are equipped with an emergency waste feed cut off and audible high level alarm systems, and vent directly to the atmosphere. The tanks are serviced by an above ground galvanized steel piping system, with associated pumps. These pipes are of two or three inch diameter, and run from the Work Area (SWMU 3) to the tanks. They are serviced by an above ground galvanized steel piping system, with associated pumps. These pipes are of two to three inch diameter, and run from the Work Area (SWMU 3) to the unit, and its tanks.

Dirty solvent is pumped from the Work Area (SWMU 3) to whichever tank is currently receiving waste. See Figure III-1 for a diagram of waste flow between these units. The tanks are emptied by a tanker truck at the Tanker Truck Load/Unload Area (SWMU 7) on an approximately weekly basis according to facility representatives. The dirty solvent is returned to Safety-Kleen's Denton, Texas recycling facility. Sludge from the tanks is

Project Name: Safety-Kleen
Jackson Facility

Date: April 1990

FIG. III-1
WASTE FLOW AT SWMUS 2 AND 3
THE TANK MANAGEMENT AREA, AND WORK AREA



SYSTEM SCHEMATIC

90-113-1

SWMU DATA SHEET

removed by a vacuum truck on an approximately yearly schedule according to the facility representatives. This sludge is returned to the recycle facility. The recent annual integrity assessment found both tanks to be in "good condition". No staining was observed in side the containment system, and neither tank appeared to be releasing at the time of the VSI.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

Waste mineral spirits (D001, D006 and D008).

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (M)
 Groundwater (M) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(S):

There was no history of releases from this unit found in the file material, and none were observed during the VSI. However, given the facility's practice of dumping potentially contaminated water from the containment system to nearby soils, a potential for release to soils exists.

RECOMMENDATIONS: No Further Action ()
 RFA Phase II Sampling (X)
 RFI Necessary ()

REFERENCE(S): 23, 49, 56

COMMENTS:

None.

Project Name: Safety-Kleen
 Jackson Facility

Date: April 1990

SWMU DATA SHEET

SWMU NUMBER: 3

PHOTO NUMBERS: 3, 8, 9, 10

NAME: Work Area

TYPE OF UNIT: Solvent Return/Fill Area

PERIOD OF OPERATION: 1979 to present

PHYSICAL DESCRIPTION AND CONDITION:

This unit is a self contained structure constructed entirely of metal. All dirty mineral spirits drums are returned to this unit on a daily basis. It is approximately 35 feet by 34 feet in area, with a sheet metal roof and walls on three sides. The base of the unit was observed to consist of a 35 foot by 34 foot by six inch deep metal pan with a capacity of approximately 1,100 gallons. This pan is designed to manage any spills from the activities at the unit. Approximately three feet above the pan is the steel grating which serves as the floor for the solvent return/fill activities. Three solvent return dumpsters are embedded in this floor (resting on the pan below). Only two are reportedly used for return activities according to the facility representatives. Typically, a customer representative returns from their run and backs the truck up to the unit in order to unload the drums of dirty solvent. The drums are removed from the truck, and poured into one of the two dumpsters. The dirty liner is then removed from the drum, replaced with a clean liner and placed in a separate 30 gallon drum. This drum which contains liners is removed to the Paint Waste Shelter (SWMU 4), where it is eventually returned to the New Castle facility. The dumpsters are of carbon steel construction, have a steel grating screen, and have a capacity of 374 gallons. They are approximately four feet by two feet by five feet in dimension, and have a steel lid which is kept closed when not in use. They are connected by two inch diameter galvanized steel pipes to both of the Waste Solvent Tanks (SWMU 2). When a dumpster is judged to be full it is emptied using a pump to discharge its contents to one of the tanks mentioned above. (See Figure III-1 for a diagram of waste flow.) Within the two active dumpsters are 10 to 12 five-gallon cans, which are used to assist in sludge removal. According to the facility representatives sludge is removed from the units on an as needed basis several times per year. It is handled in the same manner as the liners, in that it is stored in SWMU 4 until it can be shipped to New Castle. The unit processes approximately 120,000 gallons of mineral spirits yearly, according to facility representatives. The unit has been in this particular location for only the past 18 to 24 months. Prior to that time it was located approximately 50 feet south and east of its current location. At the time of

Project Name: Safety-Kleen
Jackson Facility

Date: April 1990

SWMU DATA SHEET

the VSI this area was observed to have a number of stains which appear to have been associated with solvent return/fill activities.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

Waste mineral spirits (D001, D006, D008).

RELEASE PATHWAYS: Air (L) Surface Water (H) Soil (H)
 Groundwater (H) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(S):

No history of release was found in the file material, and none was observed from the unit's current location. However, a number of stains were visible in the unit's original location. These stains would appear to be from activities associated with the unit. Photograph 3 in the Appendix C illustrates the staining.

RECOMMENDATION: No Further Action ()
 RFA Phase II Sampling (X)
 RFI Necessary ()

REFERENCES: 23, 49, 56

COMMENTS:

The former work area is located within the same geographical location as SWMU 5. Phase II sampling may be coordinated with the suggested sampling at the Facility Stormwater Runoff Control.

Project Name: Safety-Kleen
 Jackson Facility

Date: April 1990

SWMU DATA SHEET

SWMU NUMBER: 4

PHOTO NUMBERS: 6, 7

NAME: Paint Waste Shelter

TYPE OF UNIT: Ignitable Waste Storage Area

PERIOD OF OPERATION: Since approximately 1988 to present

PHYSICAL DESCRIPTION AND CONDITION:

This is a RCRA permitted unit. It rests over a metal pan (in the same manner as SWMU 3) and is constructed of sheet steel, with a floor of steel grating to allow any releases to be contained in the pan. The dimensions of the unit are approximately 35 feet by 20 feet. The pan's dimension are the same, with a six inch wall. At the time of the VSI, the pan was observed to have a small amount of standing water in it and was also observed to be rusty. The unit is kept locked except when in use. Customer representatives who have picked up ignitable wastes (primarily waste paint related materials) unload the sealed drums directly from their truck to this unit. At the time of the VSI, seven five-gallon cans of waste paint were observed in the unit. A truck picks waste up from this unit on an approximately quarterly basis, according to facility representatives. No evidence of release was noted at the time of the VSI. The unit has a reported capacity of 2,184 gallons.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

Paint waste (D001, D006, D007, D008, F003 and F005), and sludge from solvent return/fill activities (D001, D006).

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L)
 Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(S):

No history of release was found in the file material, and no releases were noted at the time of the VSI.

RECOMMENDATION: No Further Action (X)
 RFA Phase II Sampling ()
 RFI Necessary ()

REFERENCES: 23, 56

Project Name: Safety-Kleen
 Jackson Facility

Date: April 1990

SWMU DATA SHEET

COMMENTS:

No further action other than continued compliance with RCRA requirements.

Project Name: Safety-Kleen
Jackson Facility

Date: April 1990

SWMU DATA SHEET

SWMU NUMBER: 5

PHOTO NUMBER: 3, 4, 5, 14, 15

NAME: Facility Stormwater Runoff Control

TYPE OF UNIT: Stormwater Control

PERIOD OF OPERATION: Since approximately 1988 until the present

PHYSICAL DESCRIPTION AND CONDITION:

The unit is an integral part of the concrete working/parking area added by the facility in the last several years. It is designed to transfer rainwater from all working areas of the facility to its western margin. As such it is simply a low point in the concrete which slopes towards the western edge of the facility. A concrete "flume" is located at the terminus of the unit. This portion of the unit acts to transfer the stormwater away from the facility in an attempt to minimize erosion. At the time of the VSI, it was raining, and the transfer of stormwater through this unit was noted. A number of stains were noted at the unit. These stains appear to be associated with the former location of the Work Area (SWMU 3). It was also noted that some runoff from the rainwater exited the facility on its southern side on an approximate line with the southern edge of the facility building. Stormwater formed a small pool at the base of the unit western discharge point and appeared to meander off to an unimproved area of the facility. A number of bubbles were seen on the surface of this pool, although their significance is not known.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

The unit manages stormwater which may be contaminated with waste mineral spirits (D001, D006, and D008).

RELEASE PATHWAYS: Air (L) Surface Water (H) Soil (H)
 Groundwater (H) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(S):

There were no releases reported in the file material. However, the unit is designed to release to the environment, and may manage hazardous constituents.

RECOMMENDATIONS: No Further Action ()
 RFA Phase II Sampling (X)
 RFI Necessary ()

REFERENCE(S): 23, 56

Project Name: Safety-Kleen
 Jackson Facility

Date: April 1990

SWMU DATA SHEET

COMMENTS:

Staining was noted on various areas of the concrete at the facility. In addition, the unit manages waste water from truck washing activities (SWMU 6) suggesting that the unit may manage waste mineral spirits.

Project Name: Safety-Kleen
Jackson Facility

Date: April 1990

SWMU DATA SHEET

SWMU NUMBER: 6

PHOTO NUMBER: None

NAME: Truck Washing Area

TYPE OF UNIT: Truck washing

PERIOD OF OPERATION: Since 1979

PHYSICAL DESCRIPTION AND CONDITION:

It was discovered subsequent to the VSI that the facility performed all truck washing activities on site. The facility representative reported that trucks are washed near the garage entrance to SWMU 1. The trucks are washed as needed, with an internal washing approximately once per month. Biodegradable soap is used. All washwater flows to the west along SWMU 5, and is eventually discharged to bare soil on the unimproved portion of the facility.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

The unit generates wastewater from truck washing activities. The wastewater may be contaminated with mineral spirits from spills which occur within the trucks, and oils from the trucks.

RELEASE PATHWAYS: Air (L) Surface Water (H) Soil (H)
 Groundwater (H) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(S):

Although no information on this unit was found in the file materials, the method of its operation causes it to release to the environment.

RECOMMENDATIONS: No Further Action ()
 RFA Phase II Sampling (X)
 RFI Necessary ()

REFERENCE(S): 56

COMMENTS:

None.

Project Name: Safety-Kleen
 Jackson Facility

Date: April 1990

SWMU DATA SHEET

SWMU NUMBER: 7

PHOTO NUMBER: None

NAME: Tanker Truck Load/Unload Area

TYPE OF UNIT: Clean and Waste Solvent Transfer

PERIOD OF OPERATION: 1979 to present

PHYSICAL DESCRIPTION AND CONDITION:

The unit is located within the containment system of the Waste Solvent Tanks (SWMU 2). The unit is a concrete area immediately adjacent to the piping used to load and unload solvent. The purpose of this unit is to load and unload clean and waste mineral spirits from the Tanks (SWMU 2), and to the Product tanks. This is done approximately weekly with a tanker containing clean solvent discharging to the clean solvent tank, and then accepting the waste solvents.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

Waste mineral spirits (D001, D006 and D008).

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L)
 Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(S):

There was no history of releases from this unit found in the file material, and none were observed during the VSI.

RECOMMENDATIONS: No Further Action (X)
 RFA Phase II Sampling ()
 RFI Necessary ()

REFERENCE(S): 56

COMMENTS:

No further action other than continued compliance with RCRA requirements.

Project Name: Safety-Kleen
 Jackson Facility

Date: April 1990

IV. SUMMARY

TABLE IV-1

LIST OF SWMUs IDENTIFIED DURING THE RFA

<u>UNIT NO.</u>	<u>UNIT NAME</u>
1	Container Storage Area
2	Waste Solvent Tanks
3	Work Area
4	Paint Waste Shelter
5	Facility Stormwater Control
6	Truck Washing Area
7	Tanker Truck Load/Unload Area

TABLE IV-2

SWMUs REQUIRING NO FURTHER ACTION

<u>UNIT NO.</u>	<u>UNIT NAME</u>
1	Container Storage Area
4	Paint Waste Shelter
7	Tanker Truck Load/Unload Area

TABLE IV-3

SWMUs REQUIRING PHASE II SAMPLING

<u>UNIT NO.</u>	<u>UNIT NAME</u>
2	Waste Solvent Tanks
3	Work Area
5	Facility Stormwater Control
6	Truck Washing Area

V. SUGGESTED SAMPLING STRATEGY

<u>Unit No.</u>	<u>Unit Name</u>	<u>Operational Dates</u>	<u>Suggested Sampling</u>	<u>Evidence of Releases (Y/N)</u>
2 ¹	Waste Solvent Tanks	1979 - present	Soil and sediment samples should be taken from the point immediately south of the flume discharge point.	N
3 ¹	Work Area	1979 - present		Y
5 ¹	Facility Stormwater Control	1988 - present	A minimum of three samples should be taken from the surficial soils or sediments. If standing water is present at the time of the sampling event then a water sample should also be taken. These samples should be analyzed for the Appendix IX semi-volatile constituents, and metals, and mineral spirits. An additional three soil samples should be taken at the cracked concrete area parallel with the southern margin of the warehouse. Finally, three soil samples should be taken at the point where the runoff was observed exiting the pad (this point is also approximately parallel with the southern margin of the warehouse).	Y
6 ¹	Truck Washing Area	1979 - present		Y

Notes

- ¹ All runoff from the facility is discharged via the Facility Stormwater Control (SWMU 5). Therefore any potential releases from the Work Area and Truck Washing Area (SWMUs 3 and 6) would discharge to SWMU 5. It is suggested that the facility modify its Truck Washing Operations to remove the release potential for the unit. Verification of the integrity of the pan used as containment for SWMU 3 is suggested and if found to be impaired the unit repaired.

VI. References

1. Hazardous Waste Inspection Form, December 12, 1980.
2. Letter to Theodore Mueller, Safety-Kleen from John P. Lehman, U.S. EPA, Re: Petition for Clarification or Modification of Regulation, July 21, 1981.
3. Letter to Cindy Rich, Mississippi Bureau of Pollution Control from Kevin K. Hersey, Safety-Kleen, Re: Telephone Conversation of June 22, 1982, June 22, 1982.
4. Letter to Kevin K. Hersey, Safety-Kleen from Cindy Rich, Division of Solid Waste Management, Re: Applicability of the Mississippi Hazardous Waste Regulation, July 8, 1982.
5. Mississippi Department of Natural Resources, Bureau of Pollution Control Memorandum from Cindy Rich, Re: Figures Concerning Mississippi Operations, July 8, 1982.
6. Letter to Kevin K. Hersey, Safety-Kleen from Cindy Rich, Division of Solid Waste Management, Re: List of Hazardous Waste Storage, Treatment, or Disposal Facilities, October 25, 1985.
7. Letter to Jeffrey Simpson, Safety-Kleen from David E. Lee, Hazardous Waste Section, Re: Termination of Interim Status by the Pollution Control Permit Board, May 1, 1984.
8. Part A Application, June 7, 1985.
9. Letter to U.S. EPA Region IV from Burton E. Ericson, Safety-Kleen, Re: Part A Application, July 2, 1985.
10. Letter to Burton E. Ericson, Safety-Kleen from David E. Lee, Hazardous Waste Section, Re: Mississippi Hazardous Waste Notification, July 23, 1985.
11. Correspondence to U.S. EPA Region IV, Waste Engineering Section from Burton E. Ericson, Safety-Kleen, Re: Part A Submittals, December 9, 1985.
12. Notes from C. Dana, Mississippi Department of Natural Resources, Bureau of Pollution Control, Re: Safety-Kleen Letter dated May 22, 1986 from S. Walczynski, June 6, 1986.
13. Correspondence to Caleb Dana, Bureau of Pollution Control, Mississippi Department of Environmental Control from Stanley Walczynski, Safety-Kleen, Re: Meeting of May 24, 1986, June 8, 1986.
14. Interim Compliance Checklist, June 19, 1986.

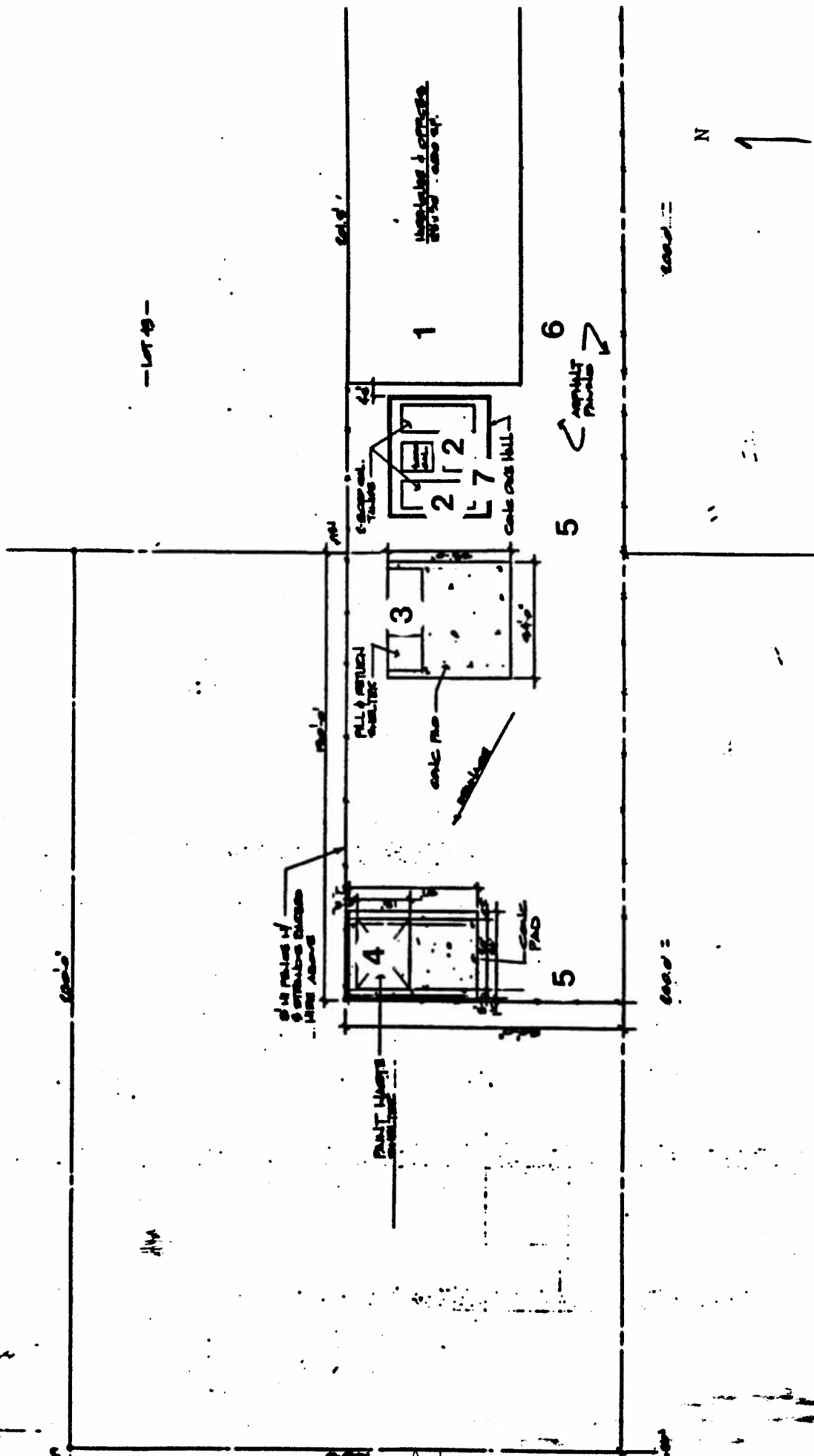
15. Letter to Charles Van Landingham, Safety-Kleen from Jim Hardage, Mississippi Department of Natural Resources, Re: Inspection of July 9, 1986, June 9, 1986.
16. Letter to Jim Hardage, Mississippi Department of Natural Resources from Stanley Walczynski, Safety-Kleen, Re: Jim Hardage's Letter of July 31, 1986, July 31, 1986.
17. Letter to Dun Putnam from Chief Jon A. Hilderbrand, Jackson Fire Department, Re: Approval for the Storage of Lacquer Thinner and Hazardous Waste, December 1, 1986.
18. Letter to Stanley Walczynski, Safety-Kleen from Jim Hardage, Mississippi Department of Natural Resources, Re: Telephone Conversation on December 5, 1986 about Storage of Ignitable Waste, December 10, 1986.
19. Correspondence to Jim Hardage, Mississippi Department of Natural Resources from Paul Pederson, Safety-Kleen, Re: Letter from Fire Marshall of Jackson, December 22, 1986.
20. Record of Telephone Conversation, Paul Pederson, Safety-Kleen from J. Hardage, Re: Request for a Variance from the 50-foot Setback Requirement for Ignitable Waste, January 12, 1987.
21. Correspondence to Jim Hardage, Mississippi Department of Natural Resources from Paul Pederson, Safety-Kleen, Re: Variance from the 50-foot Setback Requirement for Ignitable Waste, January 20, 1987.
22. Correspondence to Sam Marby, Mississippi Department of Natural Resources from Veldon Missick, Visat Polymers, Re: An Inappropriate Hazardous Waste Manifest, April 13, 1987.
23. Part B Permit Application, October 12, 1987.
24. Letter to Undine Johnson, Mississippi Bureau of Pollution Control from Ellen J. Jurczak, Safety-Kleen, Re: Submission of Part B, October 19, 1987.
25. RCRA Inspection Report. Prepared by Undine Johnson, November 3, 1987.
26. Interim Status Compliance Checklist, November 3, 1987.
27. Letter to Sam Marby, Mississippi Department of Natural Resources from James Scarbrough, U.S. EPA Region IV, Re: Liability Coverage, December 3, 1987.
28. Correspondence to Sam Marby, Mississippi Department of Natural Resources from Allan Antley, U.S. EPA Region IV, Re: Compliance Evaluation Inspection Report, December 9, 1987.
29. Letter to Doug Redman, Safety-Kleen from Undine Johnson, Mississippi Bureau of Pollution Control, Re: Inspection of

29. Letter to Doug Redman, Safety-Kleen from Undine Johnson, Mississippi Bureau of Pollution Control, Re: Inspection of November 3, 1987, January 5, 1988.
30. U.S. EPA Region IV Memorandum to Allan Antley from Jeanne Gettle through Doyle Brittain, Re: Compliance Evaluation Inspection Report, January 5, 1988.
31. Correspondence to Sam Marby, MDNR from Allan Antley, U.S. EPA Region IV, Re: Liability Insurance, January 12, 1988.
32. Letter to Undine Johnson, MDNR from Jeffrey Simpson, Safety-Kleen, Re: November 3, 1987 Inspection, February 1, 1988.
33. Correspondence to Undine Johnson, MDNR from Jeffrey Simpson, Safety-Kleen, Re: Approval for Improvements and Modifications, February 1, 1988.
34. MDNR Memorandum to Hazardous Waste TSD Facilities from Hazardous Waste Division, Re: Annual Closure Cost Estimate Update, March 31, 1988.
35. Storage Facility Permit Application dated October 12, 1987, revised October 31, 1988.
36. Correspondence to Thad Hopper, MDNR from Paula Brach, Safety-Kleen, Re: Part B Permit Application, November 1, 1988.
37. Correspondence to Ellen Jurczak, Safety-Kleen from Wayne Fassbender, Graef, Anhalt, Schloemer and Associates Inc., Re: Aboveground Hazardous Waste Storage Tank System Integrity Assessment, January 24, 1989.
38. Correspondence to Thad Hopper, MDNR from Paula Brach, Safety-Kleen, Re: Part B Permit Application, January 31, 1989.
39. Correspondence to Thad Hopper, MDNR from Ellen Jurczak, Safety-Kleen, Re: Part B Permit Application, February 2, 1989.
40. Correspondence to Kaleel Rahaim, MDNR from Ellen Hurczak, Safety-Kleen, Re: Commentary on the Draft Part B Permits, April 26, 1989.
41. Correspondence to Thad Hopper, MDNR from Ellen Jurczak, Safety-Kleen, Re: Revised Part A Permit Application, July 10, 1989.
42. Part A Permit Application, July 10, 1989.
43. State of Mississippi Hazardous Waste Management Permit, July 25, 1989.
44. Letter to Ellen Jurczak, Safety-Kleen from Charles Chisolm, MDNR, Re: Hazardous Waste Management Permits, August 1, 1989.

45. Correspondence to Don Watts, MDNR from Ellen Jurczak, Safety-Kleen, Re: Air Emission Equipment, August 7, 1989.
46. Permitting Work Form, August 14, 1989.
47. MDNR Memorandum to Danny Jackson from Chris Roussel, Re: Operating Permit for Mineral Spirits Storage Vessels, September 5, 1989.
48. Correspondence to Scott Fore, Safety-Kleen from C. Adam Smith, MDNR, Re: Operating Permit for Air Emissions Equipment, September 14, 1989.
49. Annual Integrity Assessment Used Solvent Storage Tank System Jackson, Mississippi, February, 1990.
50. Public Notice of Proposed Hazardous Waste Permit Application Approval from Mississippi Natural Resources Permit Board, undated.
51. RCRA F-Solvent Land Restriction Treatment, Storage and Disposal Requirements Checklist, undated.
52. Fact Sheet Permit Issuance, undated.
53. Emission Inventory Form, undated.
54. Regulatory Completeness Checklist for Hazardous Waste Storage, Treatment and Disposal Facilities, undated.
55. Soil Survey of Hinds County, Mississippi, March 1979.
56. VSI Log, March, 1990.
57. Water Resources Data Mississippi Water Year 1988.

APPENDIX A

FIGURE A-1
SWMU MAP OF THE JACKSON MS. SAFETY-KLEEN FACILITY



LEGEND:

⑦ = SWMI

APPENDIX B

VSI LOG

The VSI at the Jackson Safety-Kleen facility took place on March 1, 1990. The participants included, Nancy Bethune U.S. EPA Region IV, Steve Spengler MDNR, and J.A. Atchue III and Paula Goggin of A.T. Kearney. The weather was cloudy throughout with some light rain. All times were recorded as Central Standard Time (CST). Due to an error on the part of the photographer, the date on the photos indicates 29 (February). A start-up meeting was held at approximately 8:45 am, with the above-mentioned personnel and two representatives from Safety-Kleen, Ed Lucky the facility manager, and J. L. Lanahan their Regional Environmental Engineer. After the meeting the facility was inspected. This was completed at approximately 10:00 am, and a closeout meeting was held. The field team left the facility at approximately 10:45.

Reference St

Safety-Kleen
Jackson, MS

CST

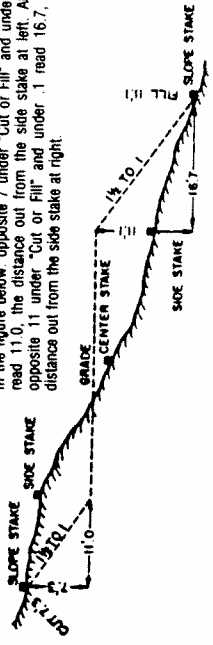


The paper in this book is made of 50% high grade rag stock with a WATER RESISTING surface sizing.

DISTANCES FROM SIDE STAKES FOR CROSS-SECTIONING

Roadway of any Width. Side Slopes 1 1/2 to 1.

In the figure below, opposite 7 under "Cut or Fill" and under .3 read 11.0, the distance out from the side stake at left. Also, opposite 11 under "Cut or Fill" and under .1 read 16.7, the distance out from the side stake at right.



Distance out from Side or Shoulder Stake	Distance out from Side or Shoulder Stake									
	0	1	2	3	4	5	6	7	8	9
0	0.0	0.2	0.3	0.5	0.6	0.8	0.9	1.1	1.2	1.4
1	1.5	1.7	1.8	2.0	2.1	2.3	2.4	2.6	2.7	2.9
2	3.0	3.2	3.3	3.5	3.6	3.8	3.9	4.1	4.2	4.4
3	4.5	4.7	4.8	5.0	5.1	5.3	5.4	5.6	5.7	5.9
4	6.0	6.2	6.3	6.5	6.6	6.8	6.9	7.1	7.2	7.4
5	7.5	7.7	7.8	8.0	8.1	8.3	8.4	8.6	8.7	8.9
6	9.0	9.2	9.3	9.5	9.6	9.8	9.9	10.1	10.2	10.4
7	10.5	10.7	10.8	11.0	11.1	11.3	11.4	11.6	11.7	11.9
8	12.0	12.2	12.3	12.5	12.6	12.8	12.9	13.1	13.2	13.4
9	13.5	13.7	13.8	14.0	14.1	14.3	14.4	14.6	14.7	14.9
10	15.0	15.2	15.3	15.5	15.6	15.8	15.9	16.1	16.2	16.4
11	16.5	16.7	16.8	17.0	17.1	17.3	17.4	17.6	17.7	17.9
12	18.0	18.2	18.3	18.5	18.6	18.8	18.9	19.1	19.2	19.4
13	19.5	19.7	19.8	20.0	20.1	20.3	20.4	20.6	20.7	20.9
14	21.0	21.2	21.3	21.5	21.6	21.8	21.9	22.1	22.2	22.4
15	22.5	22.7	22.8	23.0	23.1	23.3	23.4	23.6	23.7	23.9
16	24.0	24.2	24.3	24.5	24.6	24.8	24.9	25.1	25.2	25.4
17	25.5	25.7	25.8	26.0	26.1	26.3	26.4	26.6	26.7	26.9
18	27.0	27.2	27.3	27.5	27.6	27.8	27.9	28.1	28.2	28.4
19	28.5	28.7	28.8	29.0	29.1	29.3	29.4	29.6	29.7	29.9
20	30.0	30.2	30.3	30.5	30.6	30.8	30.9	31.1	31.2	31.4
21	31.5	31.7	31.8	32.0	32.1	32.3	32.4	32.6	32.7	32.9
22	33.0	33.2	33.3	33.5	33.6	33.8	33.9	34.1	34.2	34.4
23	34.5	34.7	34.8	35.0	35.1	35.3	35.4	35.6	35.7	35.9
24	36.0	36.2	36.3	36.5	36.6	36.8	36.9	37.1	37.2	37.4
25	37.5	37.7	37.8	38.0	38.1	38.3	38.4	38.6	38.7	38.9
26	39.0	39.2	39.3	39.5	39.6	39.8	39.9	40.1	40.2	40.4
27	40.5	40.7	40.8	41.0	41.1	41.3	41.4	41.6	41.7	41.9
28	42.0	42.2	42.3	42.5	42.6	42.8	42.9	43.1	43.2	43.4
29	43.5	43.7	43.8	44.0	44.1	44.3	44.4	44.6	44.7	44.9
30	45.0	45.2	45.3	45.5	45.6	45.8	45.9	46.1	46.2	46.4
31	46.5	46.7	46.8	47.0	47.1	47.3	47.4	47.6	47.7	47.9
32	48.0	48.2	48.3	48.5	48.6	48.8	48.9	49.1	49.2	49.4
33	49.5	49.7	49.8	50.0	50.1	50.3	50.4	50.6	50.7	50.9
34	51.0	51.2	51.3	51.5	51.6	51.8	51.9	52.1	52.2	52.4
35	52.5	52.7	52.8	53.0	53.1	53.3	53.4	53.6	53.7	53.9
36	54.0	54.2	54.3	54.5	54.6	54.8	54.9	55.1	55.2	55.4
37	55.5	55.7	55.8	56.0	56.1	56.3	56.4	56.6	56.7	56.9
38	57.0	57.2	57.3	57.5	57.6	57.8	57.9	58.1	58.2	58.4
39	58.5	58.7	58.8	59.0	59.1	59.3	59.4	59.6	59.7	59.9
40	60.0	60.2	60.3	60.5	60.6	60.8	60.9	61.1	61.2	61.4

Participants:

Jay Lanahan, S-L

Ed Lucky, S-K

Steve Spengler, MNR

Nancy Bethune, EPA

Joe Atchue, ATK

Paula Goggin, ATK

Joe gave briefing of what
we need to know + see.

No releases to press

ptpt. Ed lucky to

give sketch. give

9:11 3/1

3-6-9 wk schedule.

8-10 day schedule

tanker pickup 7,000 gals.

20,000 annualized fills

20,000 gals every quarter

for min. spiv. Other wsts

Kept in drums per 1,

carbenter cleaner, paint wsts,

sludge from dumpsters.

Min. spiv. from dump to tank.

Denton, TX picks up only

7,000 gal at a time. 40¢

pickup per yr. *ma*

31, 33
all pipping above ground.
went to get them.

No Releases since he's

been here - last July.

Facility in operation

since - have to check records.

Building built b-y SK

moved in. Not sure

what went on here b-y

SK. Reportedly, General

Office warehouse.

9 - 16+33 gal drums/wk

of any clear wst.

Pres

8:11 3/4
18 - 1/4 gal } dry / mo.
16 - 1/2 gal } clean / mo.

Immuns. clau.

9-12 drums / wk

Good Waste

Wet Tanks 1 - 8,000 gal
2 - 4,000

Product Tanks 1 - 2,000
2 - 4,000

Tanks in operation since 7/8

Tanks in same area.

Return/Fit has been moved

in 1 1/2 - 2 yrs. Summer 89

QMS

9:22

311

Local products info &

Soil boring info.

Container Storage

Clean + WST - left

et.

Capacity 44-bbl

Part, Inner, Sludge

Sludge - 18 ft

Clean dumpsters

Plastic bag liners

25 x 45

4" curbs

interceptor fence

at gate

Q12

9:26

Photo 1 & 2 panorama

of container storage

Area - on left

Prod - out

15 gins of 16 gal

No staining

Photo 3 9:31

Former. Return (Fill)

Area - Summer

Cracks / Staining

12" long

Cracks have been

filled. Cracks are wide

enough to reach soil.

But no staining.

Tank Farm

horizontal.

Drainage to Sockley div.

by former Retn / Fill Area.

Skim on mixed water.

Lightest bucket held

Drains to West End.

END

2 1/2" 4" deep

Photo 4 SW corner →

fairings

Photo 5 Jerry E.
Runoff Control
Structure.

4:34

3'

Surface Water Runoff
Control Area

Own 75 ft to W
Own to Blue Building W.

Paint W. Area

Clean + Dirty Storage

Opera Since ~~18~~ 18-24 Nov.

No paint here before

Water in 3rd compartment

Rainwater - Wet Vac

to dumpsters + tank

One

9:30

Photo 6

Drums in Port
West Street

Photo 7 9:40

Detachable shed
of Portwest storage
2 bang metal pen

After rain fall w/in 24 hrs
to dreg -> track
w/in 10 days of picking
up from the New Coastal, KY.
stored here for 7 days
10 16-gal/uk.

F series here

20X15
sheet
steel construction

Complex w/ 500 ft rule

Grating 3 ft above metal pen

Need to move sludge in

to meet 200 ft rule -> 11/11/2018

Photo 8 9:47
Cleanup - used 1 of 7 active
dumpsters in fall

Photo 9 9:51
Return / Fill Station
Area

9:49 9:10

2-3 yd³ dumpsters w/pails
inside.
Sludge collects in pails
manage sludge.

Drums are excess
clean product.

Bag to clean in drums.
10 1/2 barrel drum
washing area.

Containment in pan
no sumps
Moved to current site
18 24 mos ago

31.9.

Metall Pans protog.

24 hr van fall - ?

check part B

Concluti been shallow!"

b) only 3 or 4

Solvent Return Fill

have 3 dumpsters - use 2

Tucks during waste

into dumpsters

Drum

Metall containment pan

6" wall floor

Consignments

only 10

9:52

Photo 10 + 11

return
fill

truck
Containment
area

3/11/11

2" galv. pipe
serv. wst tanks

metal pan is
rusting in spots.

Piping goes from R/F
to Tank Farm

3" galv. steel
steel Containment

skids - welded to them

No provision to be drained

sump. Barrels to
contain spillage

and

Photo 12

drums to
contain
spill

3/1
Rainwater pumped
across fence. 27
sheer pump to barrels
+ to dump → truck.

Washer - over fence.
Electrical standing
for alarm syst.
Since '78

Drig. Tanks
No cracks
Parted w/ epoxy

Photo 13 9:58
Tank jam

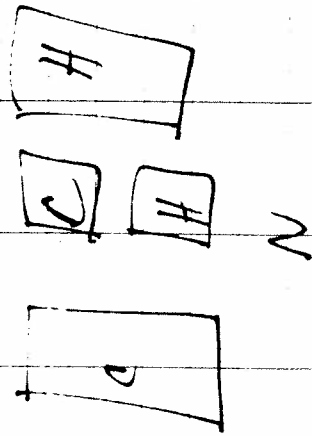


Photo Western
pyro
Plot of Containment
area

Photo B 10:00

Drainage Terminator
area
mobile on water

3-3 1/2 ft high

concrete wall

Part of original unit

95% of alarm

Overgas control

of each tank

Release detect apt.

Map

800 ft W

4000 ft N of Hawkins
field

2/1/4
Request lost
Request Bianucci rep.

Re Mr. Traut's due today
for both Jackson & Southaker.

Spoken w/ Janice Crampin
in Bureau of Land & Water

Resources. - water depth
- regional flow

Follow thru of Sept. mile

Possible variance, & about

by J. Marshall. S.K.

Will measure & mark Sept. 1/4.

End of meeting 10:25.

APPENDIX C

PHOTOGRAPHIC LOG

A total of 15 photographs were taken during the VSI. The photographer throughout was Joe Atchue. The film used was Kodacolor 200.



Photo 1.

9:26 am

View of the Container Storage Area (SWMU 1). Only the red drums on the left hand side of the photograph were managing waste at the time of the VSI. All the other drums in the photograph were either storing product or were empty.



Photo 2.

9:26 am

A second view of SWMU 1. Note that the floor is sealed. The cracks in the foreground appeared to be shallow. The trench and dike interface can be seen in the right foreground.

COR

MS 000 776 765

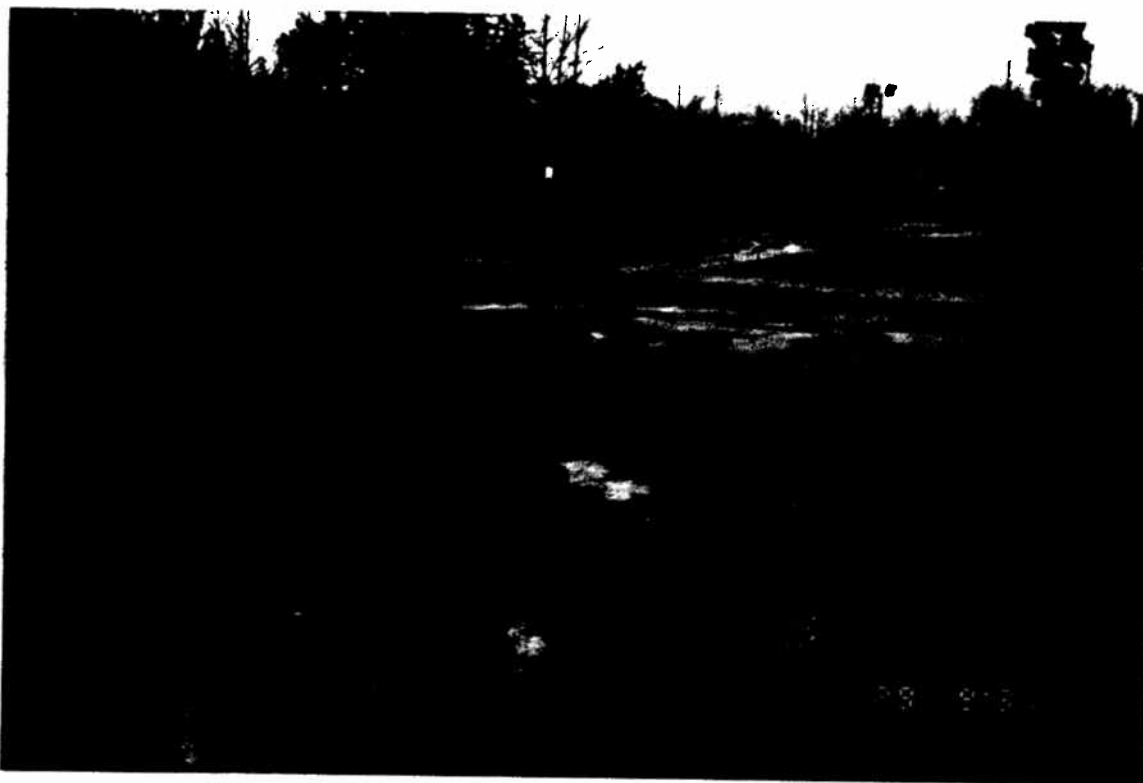


Photo 3.

9:31 am

An overview of the Facility Stormwater Control (SWMU 5). Note the cracked concrete in the foreground. Rainwater can be seen collecting in the low parts of the concrete area which constitute this unit. Another area of runoff can be seen at the left middle ground of the photo, as can some staining in the center.

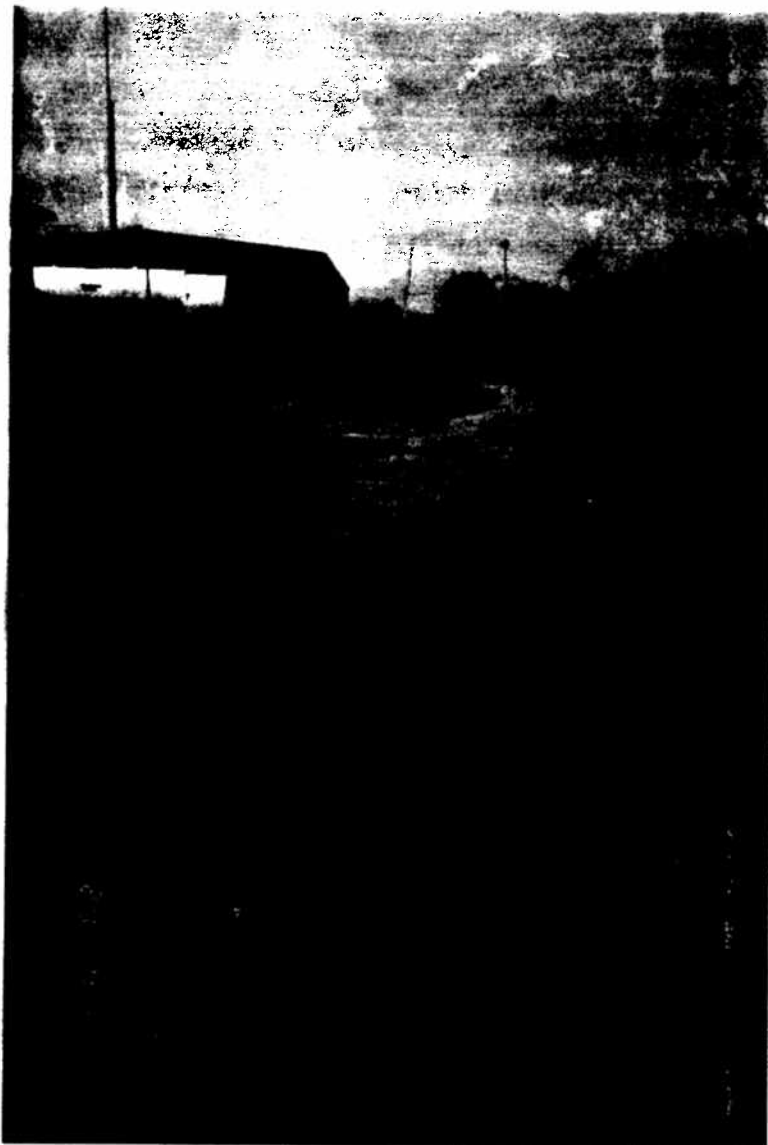


Photo 5.

9:36 am

Reciprocating view to Photo 3. Note that the concrete appears to be darker under the rainwater. This appeared to be staining, and not simply wetting due to the rainwater.

COR

MS 000 776 765

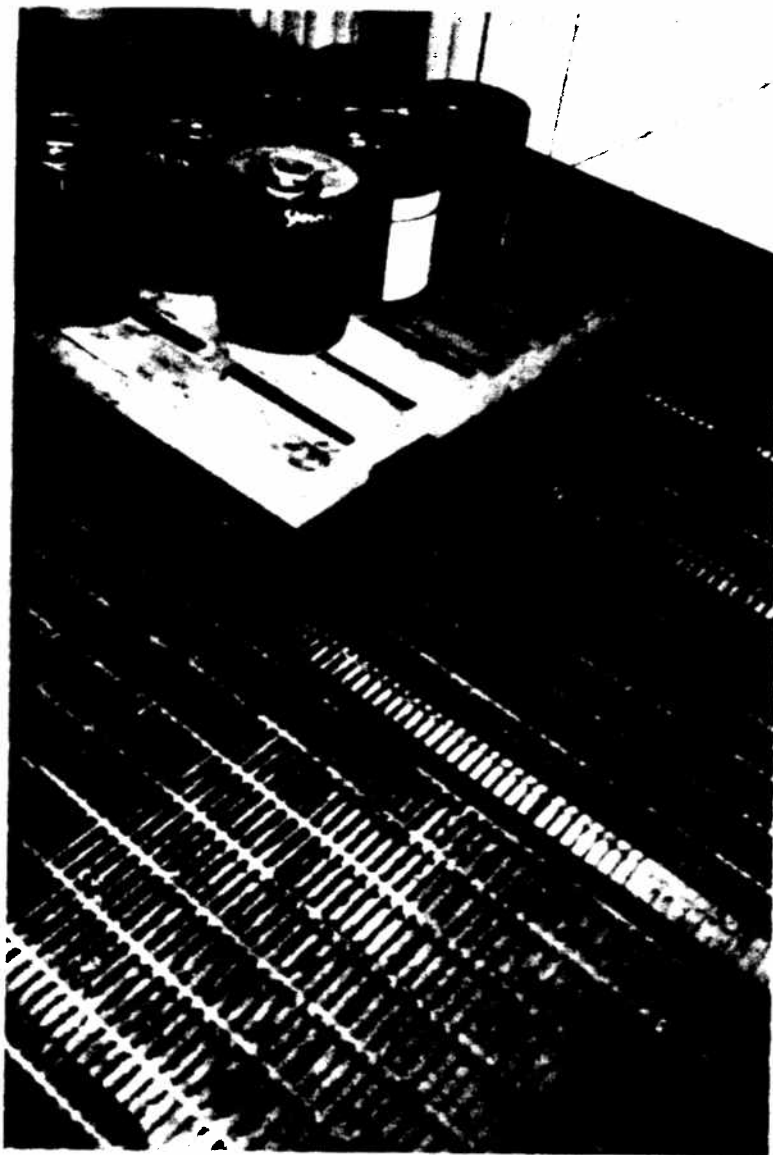


Photo 6.

9:39 am

Interior of the Waste Paint Shelter (SWMU 4). Note the rusty coloration below the grating. This is reportedly due to rainwater in the pan, beneath the unit. The seven cans of paint waste were the total volume wastes managed at the time of the VSI, although some product was also stored here.

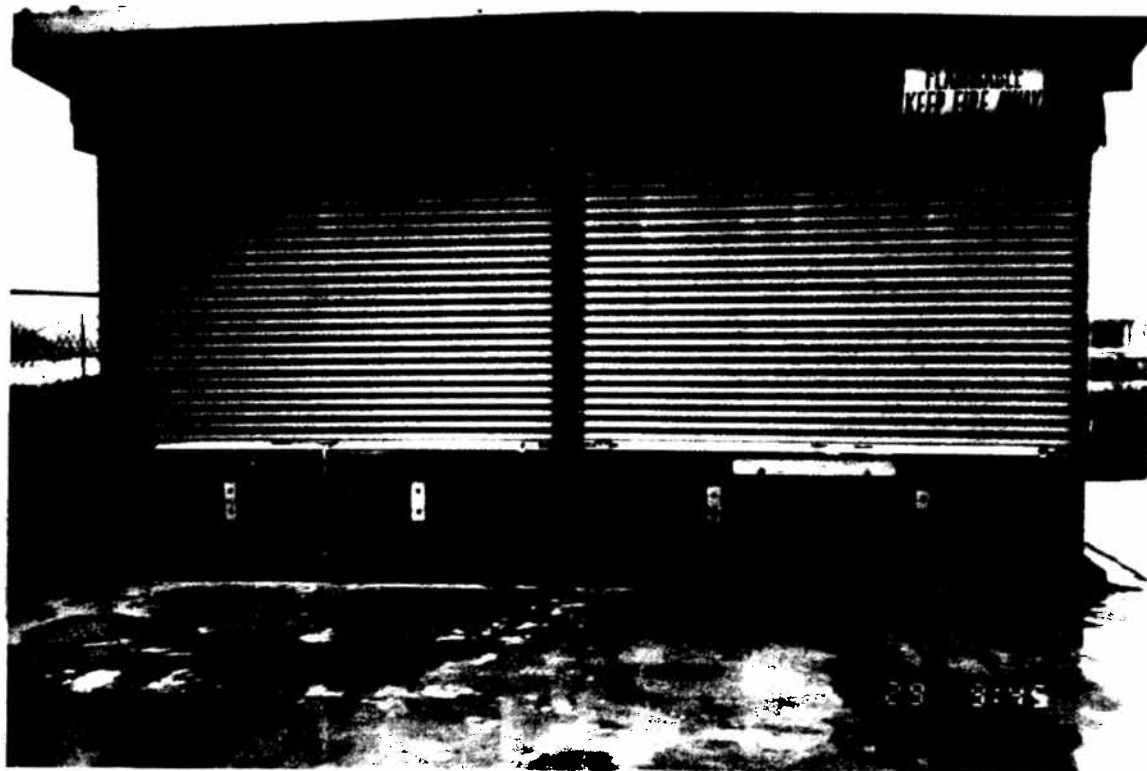


Photo 7.

9:45 am

Exterior view of the Waste Paint Shelter (SWMU 4). Both bay doors may be used at the same time for loading/unloading. Note the metal pan in which the unit rests.



Photo 8.

9:49 am

Interior view of one of the dumpsters located at the Work Area (SWMU 3). Waste mineral spirits are poured into these dumpsters and then pumped to the Tank Management Area (SWMU 2). The five gallon cans in this dumpster are to assist in sludge management, according to facility representatives.

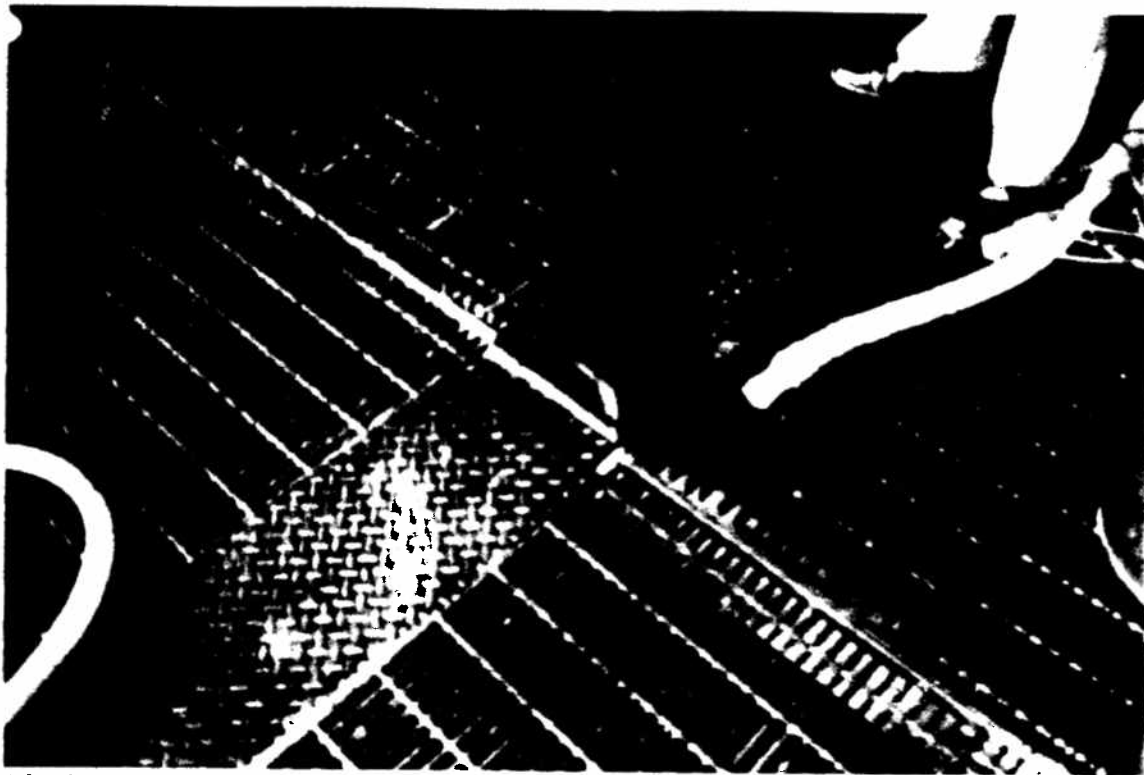


Photo 9.

9:51 am

View of the grating floor of the Work Area (SWMU 3). Any spills would flow through the grating, to the metal pan below. The white tubing at the center is part of the vacuum system used to remove any spills.

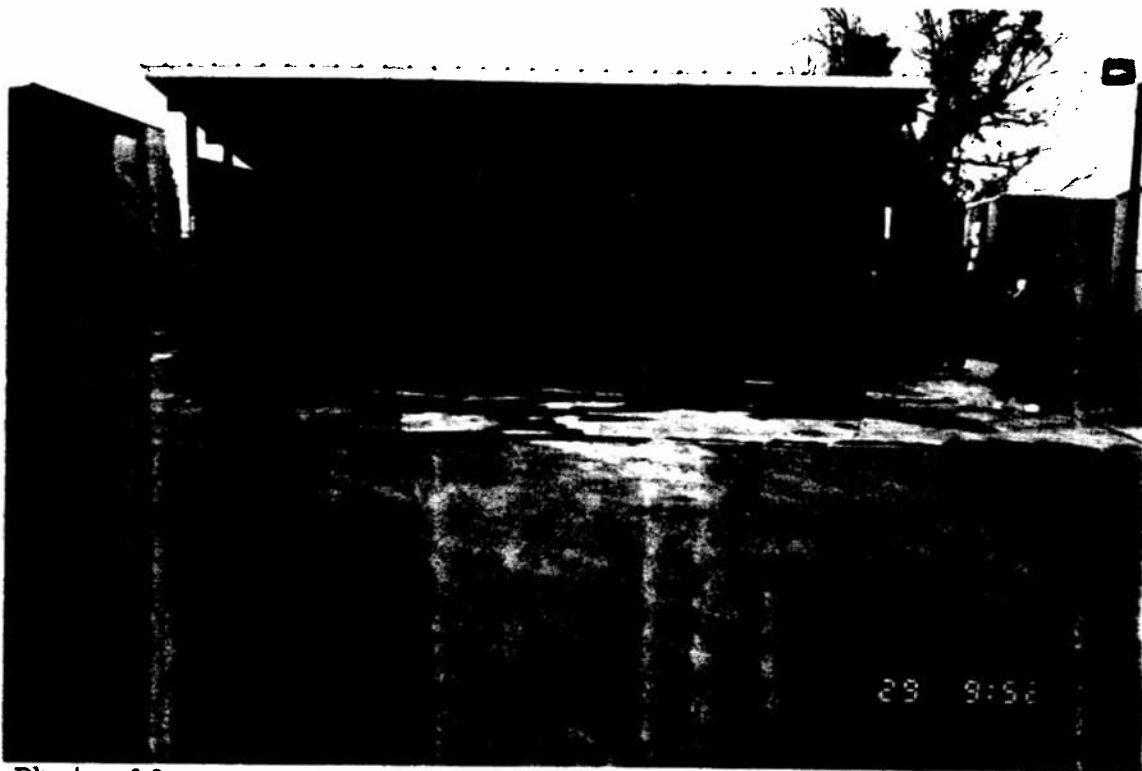


Photo 10.

9:52 am

Overview of the Work Area (SWMU 3). All the drums at the unit were empty and awaiting filling prior to being sent out. The hoses at the front of the unit are used for filling drums prior to shipment to customers. Only two of the three bays are currently active.

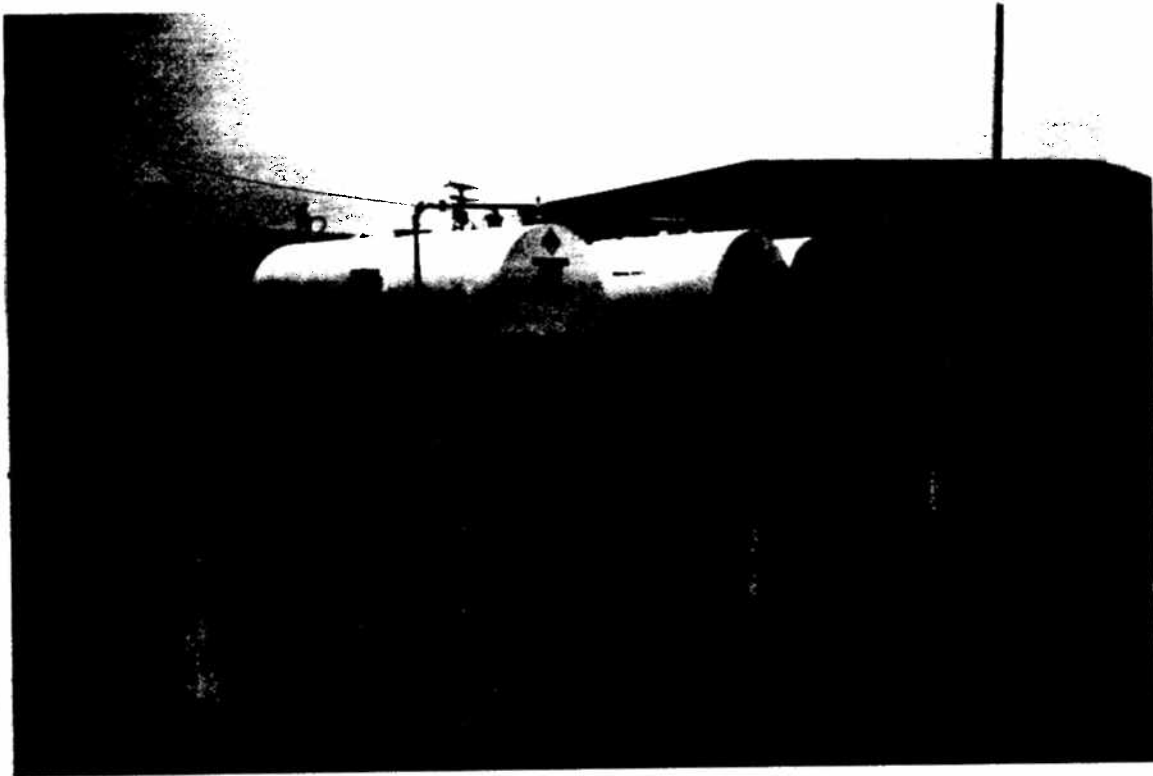


Photo 11.

9:52 am

Over view of the Tank Management Area (SWMU 2). The tank at the left of the photo is the 8,000 gallon dirty solvent tank, the smaller tank is hidden by it. Note the above ground piping at the left background, and the concrete vault which the tanks rest in.

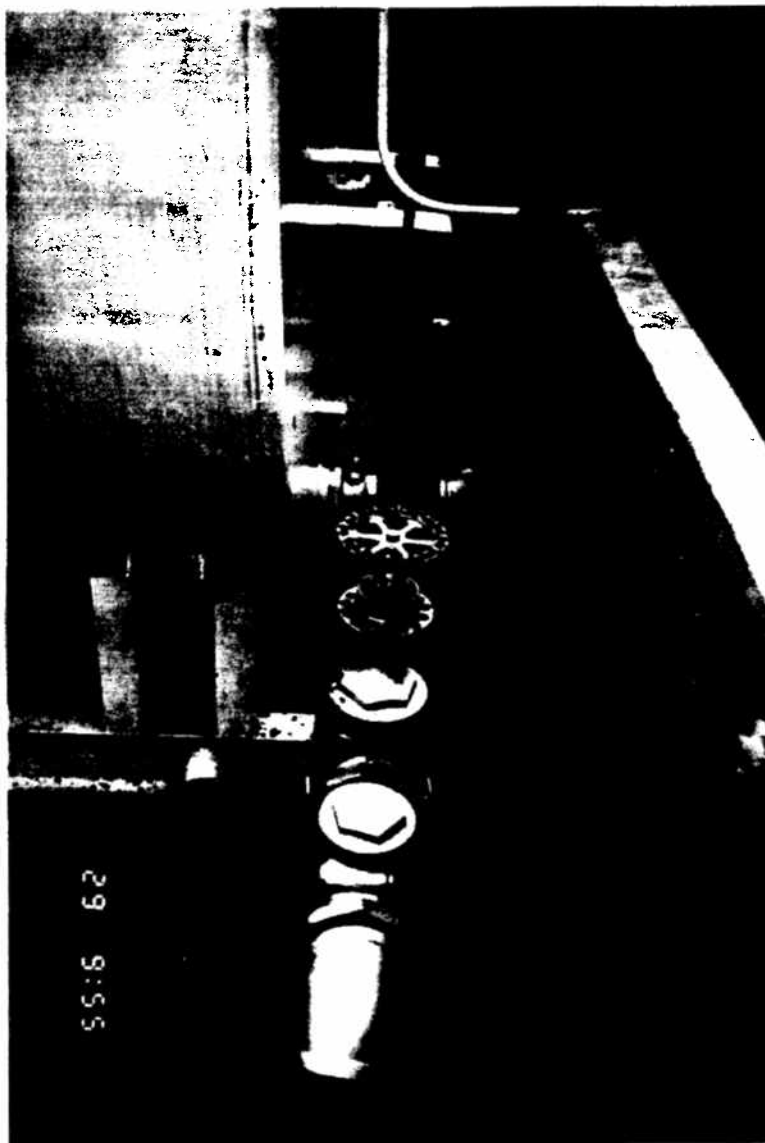


Photo 12.

9:55 am

Interior view of the vault. The two valves in the photo are for loading clean solvent (the far valve) and unloading dirty solvent (the near valve). According to the facility representatives, the buckets are placed under the valves to catch incidental spillage.

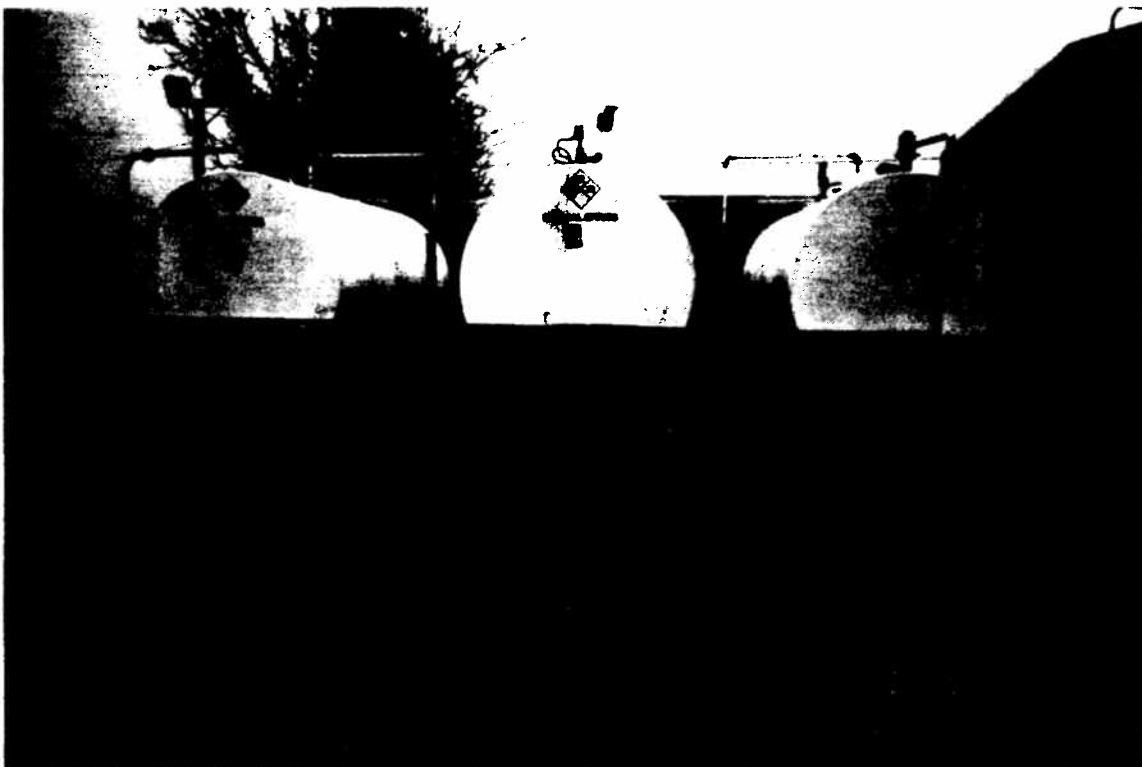


Photo 13.

9:59 am

Another view of the Tank Management Area (SWMU 2).



Photo 14.

10:00 am

View of the former site for the Work Area (SWMU 3). This unit reportedly rested on the concrete pad just forward of the bermed area. Note the staining, and cracks in the concrete.



Photo 15.

10:06 am

Termination of the Facility Stormwater Control (SWMU 5). The runoff here appeared to be several inches deep. Note the froth on the surface of the water.

COR

MS000776765